

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

INVENSAS CORPORATION,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
and SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

Civil Action No. 2:17-cv-670-RWS-RSP

JURY TRIAL DEMANDED

JOINT MOTION TO AMEND INFRINGEMENT AND INVALIDITY CONTENTIONS

Plaintiff Invensas Corporation (“Invensas”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) in accordance with Local Patent Rule 3-6, hereby jointly move the Court for leave to amend the parties’ respective disclosures under Local Patent Rule 3.

On August 26, 2018 and August 16, 2018, the parties exchanged proposed amended infringement and invalidity contentions, respectively. The parties represent to the Court that the exchange of amended contentions will not prejudice any party with respect to their ability to meet future deadlines in the case. The parties also jointly agree that good cause otherwise exists under Local Patent Rule 3-6(b) to amend their original contentions, and thus hereby jointly move the Court for the following relief: (1) that Plaintiff be permitted to amend its P.R. 3-1 and 3-2 Infringement Contentions and Accompanying Document Production; and (2) that Defendants be permitted to amend their P.R. 3-3 and 3-4 Invalidity Contentions and Accompanying Document Production.

WHEREFORE, the parties respectfully request that the Court grant this joint motion and permit amendment of their respective infringement and invalidity contentions.

Dated: August 31, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on August 31, 2018.

/s/ Melissa R. Smith _____
Melissa R. Smith